

# **EXHIBIT “B”**

**In the Matter Of:**

NEW ENGLAND COMPOUNDING PHARMACY INC. PRODUCTS LIABILITY LITIGATION

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**EXCERPT**

**VIDEOTAPED DEPOSITION OF DEBRA SCHAMBERG, R.N.**

*February 04, 2015*

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100 Mayfair Royal  
181 Fourteenth Street  
Atlanta, GA 30309  
404.847.0999

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF MASSACHUSETTS  
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5 IN RE: NEW ENGLAND  
6 COMPOUNDING PHARMACY,  
7 INC. PRODUCTS LIABILITY MDL No. 2419  
8 LITIGATION

Master Dkt:  
1:13-md-02419-RWZ

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THIS DOCUMENT RELATES  
TO:

All Actions

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EXCERPT FROM THE  
VIDEOTAPED DEPOSITION OF  
DEBRA SCHAMBERG, R.N.

9:06 a.m.  
February 4, 2015

Suite 1100  
315 Deaderick Street  
Nashville, Tennessee

Blanche J. Dugas, RPR, CCR No. B-2290



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1 Q. Oh, all right. Then I have 41 written on  
2 mine. So STOPNC\_533?

3 A. Yes.

4 Q. STOPNC\_533, Exhibit 40, I think you earlier  
5 said, quote, We're a very small entity, closed quote.  
6 Do you remember saying that?

7 A. Yes.

8 Q. And that's reflected by the fact that you  
9 have a very small formulary; right?

10 A. Correct.

11 MR. REHNQUIST: Objection.

12 Q. (By Mr. Schramek) Is it fair to say  
13 that -- can you tell me what is the relationship, if  
14 any, between the STOPNC formulary on Exhibit 40 and,  
15 for example, St. Thomas Hospital's formulary.

16 MR. STRANCH: Objection, foundation.

17 THE WITNESS: That I couldn't -- you  
18 know, I don't think that would even be  
19 close, but I can't -- I don't know what's  
20 all on St. Thomas's formulary.

21 Q. (By Mr. Schramek) Have you ever seen the  
22 formulary?

23 A. No.

24 Q. In connection with your work in STOPNC, did  
25 you ever have any interaction with the formulary?

1 A. For St. Thomas Hospital?

2 MR. STRANCH: Objection.

3 Q. (By Mr. Schramek) Hospital.

4 A. No.

5 Q. Do you personally -- do you believe that  
6 the St. Thomas Hospital formulary has anything to do  
7 with STOPNC?

8 MR. STRANCH: Objection.

9 MR. NOLAN: Objection to the form.

10 THE WITNESS: No.

11 Q. (By Mr. Schramek) And it doesn't appear  
12 that your formulary, in fact, changed since 2007; is  
13 that right?

14 A. At that time.

15 Q. And just so the record's clear, at the  
16 bottom of these policies, it says what the date  
17 written was, the dates they were reviewed, and then  
18 the dates they were revised; correct?

19 A. Correct.

20 Q. When you want to determine whether a policy  
21 has changed, that's what you look at; right?

22 A. Yes.

23 Q. We had some talk about what's referred to  
24 as the St. Thomas -- I believe the Medical Plaza. Is  
25 that the right term for it?

1 STATE OF GEORGIA:

2 COUNTY OF FULTON:

3  
4 I hereby certify that the foregoing  
5 transcript was reported, as stated in the  
6 caption, and the questions and answers  
7 thereto were reduced to typewriting under  
8 my direction; that the foregoing pages  
9 represent a true, complete, and correct  
10 transcript of the evidence given upon said  
11 hearing, and I further certify that I am  
12 not of kin or counsel to the parties in the  
13 case; am not in the employ of counsel for  
14 any of said parties; nor am I in any way  
15 interested in the result of said case.

16  
17 February 06, 2015.

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21 BLANCHE J. DUGAS, CCR-B-2290  
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